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VIA ELECTRONIC MAIL (rafati.mike@epa.gov)

July 1, 2011

Mr. Mike R. Rafati
United States Environmental Protection Agency, Region 5
Enforcement Specialist
Remedial Enforcement Support Section
77 W. Jackson Blvd., SR-5J
Chicago, IL 60604-3590

**Re: Great Lakes Transportation, Inc. Response To USEPA
Request For Information dated March 21, 2011
concerning the Chemetco Facility in Hartford,
Madison County, Illinois**

Dear Mr. Rafati:

Please consider this letter on behalf of Great Lakes Transportation, Inc. ("GLT") a response to the above referenced request for information (the Request). Enclosed with this Response is a paragraph-by-paragraph response to Request and a certification of this Response by Joseph A. Leahy, President of GLT. As an initial matter, however, we believe the Agency would benefit from an overview of the procurement of scrap metal at Chemetco, Inc. ("Chemetco"). Chemetco (or its subsidiaries) employed Joe Leahy ("Leahy") as a commercial sales representative for approximately seventeen years, from

1985 to 2001. The purpose of this narrative is to provide a context in which to view the responses to the specific questions in the Request. Four facts, in particular, warrant special mention:

- The decision to send scrap metal to the Chemetco, Inc. Hartford Facility (the "Site" or "Hartford Facility") was made by customers and Chemetco – they "selected" the Site for recycling of scrap metal.
- GLT simply transported scrap metal to Chemetco warehouses and from the warehouse to railroad yards as directed by Chemetco.
- Neither GLT nor Leahy had any involvement in the operation of the Hartford Facility.
- GLT transported scrap metal, a commercial product not a solid waste.

As we will refer back to this Introduction in our paragraph-by-paragraph response, the following paragraphs are numbered.

1. Leahy began his employment with Chemetco, Inc. in 1985 as a buyer (procurer of scrap metal). Leahy worked out of the Chicago warehouse at 24th Street & Loomis Avenue ("Loomis Avenue Warehouse"). Leahy was transferred to Europe in May 1987 (approximately) to work as a buyer for Metallo-Chimique. Leahy returned to Chicago in August 1989 (approximately).

2. While Leahy was in Europe, Chemetco, Inc. acquired Multimetco, Inc., which operated a facility in Alabama that recovered platinum from catalytic converters (the "Alabama Facility"). Upon his return from Europe, Leahy was given responsibility for procuring catalytic converters for the Alabama Facility. Approximately two years later his responsibilities were expanded to include procurement of scrap metal for the

Hartford Facility. Leahy's employment ended when Chemetco, Inc. filed for Chapter 7 bankruptcy protection in 2001.

3. The warehouses, first in Chicago and later across the United States, played a central role in procurement of scrap metal for the Hartford Facility. The Loomis Avenue warehouse was in operation when Leahy began his employment in 1985. Refugio ("Junior") Avalos ("Avalos") managed the warehouse. The Loomis Avenue warehouse was established by William Wegrzyn ("Wegrzyn")¹ to transship scrap metal to the Hartford Facility. Initially, Wegrzyn may, with authorization from Chemetco management, have leased the Loomis Avenue warehouse through a company he owned personally. When Mr. Leahy returned from Europe the Loomis Avenue warehouse was leased by Warehouse Management Services, Inc. ("WMSI"), the procurement arm of Chemetco, Inc.² The purpose of the Loomis Avenue warehouse, and subsequent warehouses, was to procure a reliable supply of scrap metal. Prior to the Chicago warehouse (and the warehouses that followed), scrap metal was shipped directly to the Hartford Facility. The warehouse system was established to penetrate local markets for scrap metal. Prior to the warehouses, with their ability to consolidate and transship scrap metal to the Hartford Facility, the only market for scrap metal were local dealers. The warehouses opened up a national market for Chemetco. When Mr. Leahy returned from Europe, WMSI had established approximately forty warehouses to transship scrap metal to the Hartford Facility, including warehouses in Baltimore, Dallas,

¹ Wegrzyn, along with John M. Suarez ("Suarez"), were part of Chemetco management both in United States and Europe. The company no longer employed Wegrzyn when Leahy returned from Europe.

² Triangle Metallurgical, Inc. was incorporated as a Delaware corporation on April 16, 1987 and changed its name to Warehouse Management Services, Inc. on July 8, 1994.

Pittsburgh and other cities across the United States.

4. A procurement agreement was always between Chemetco (or one of its subsidiaries³) and the customer. GLTI was never a party to the procurement agreement. Chemetco contracted with GTI for the transportation of scrap metal from its customers to the Chicago warehouse and from the warehouse to a railroad yard (for shipment to the Hartford Facility).

5. At "the door" payment was another innovation introduced by the warehouse procurement system. Before the warehouse procurement system was established, customers had to schedule deliveries at the Hartford Facility that would often tie up a driver and truck for an entire day. Chemetco paid customers who made deliveries to the Hartford Facility thirty days (or more) after delivery. In contrast, under the warehouse procurement system, Chemetco (or its subsidiary WMSI) paid the customer when the scrap metal was delivered to the warehouse. The warehouse procurement system moved the point of "sale" from Hartford to the warehouse.

6. In 1992 (approximately) the Chicago warehouse relocated from Loomis Avenue to 32nd Street and St. Louis Avenue (the "32nd Street warehouse"). In late 1995 the Chicago warehouse relocated to 16400 Lathrop Avenue in Harvey, Illinois (the "Harvey warehouse").

7. When Leahy returned from Europe, Avalos was handling the drayage from the Loomis Avenue warehouse to the railroad yards (for transshipment of the scrap metal to the Hartford Facility). The drayage was being conducted by Avalos with his own truck

³ Warehouse Management Services, Inc. (and its predecessor Triangle Metallurgical, Inc.) entered into the procurement agreements with customers.

without required Department of Transportation authorization. With the authorization of Chemetco management, Leahy and Avalos took over the drayage work with a company they formed. Meir Cartage, Inc., owned by Leahy and Avalos, was incorporated as an Illinois corporation on October 15, 1990. Meir Cartage, Inc. started with one truck and driver that only handled the drayage for the Chicago warehouse (24th Street & Loomis Avenue). Meir Cartage, Inc. was able to provide Chemetco with safe and reliable drayage service. Sometime around 1996 Meir Cartage, Inc. expanded beyond drayage to providing transportation from customers to the warehouse. Around the time Avalos left the company in March 1996, Leahy acquired Avalos' interest in Meir Cartage, Inc. and changed the corporate name to Great Lakes Transportation, Inc.

8. Leahy never had any involvement with operations at the Hartford Facility. When he was hired in 1985, Leahy spent a month in Hartford to receive sales training. The training focused on the varying grades and pricing of scrap metal. During his employment, Leahy visited St. Louis about three times a year. During those visits he did not necessarily visit the Hartford Facility. After Suarez purchased the Hartford Facility from Metallo-Chimique in 1994, Leahy participated in weekly conference calls (but only for those portions of the calls that discussed the purchase of scrap metal). Leahy referred customers with questions concerning environmental issues at the Hartford Facility to the environmental personnel at the facility. Leahy first learned of the "secret discharge pipe" when an article appeared in the St. Louis Post-Dispatch.

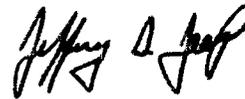
9. Great Lakes Transportation, Inc. engaged our firm in connection with this matter on June 3, 2011. We have received four bankers' boxes of business records pertaining to the transportation of scrap metal to and from the Chicago warehouses. We are in the

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process of scanning these documents into digital (PDF) files. We have not been able to review the documents in detail. At this time, we are only able to provide a preliminary response to the Request. We will supplement this Response in thirty days (our "Supplemental Response").

Please direct all future communications concerning this matter to the undersigned.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jeffery D. Jeep". The signature is written in a cursive style with a large, stylized initial "J".

Jeffery D. Jeep

cc: J. Leahy, Great Lakes Transportation, Inc.
T. Martin, USEPA (martin.thomas@epa.gov)

Great Lakes Transportation Inc. Response to Information Request

1. *Identify all persons and/or companies, including you, who may have transported materials to the Site. Such persons/companies will be hereinafter be referred to as "Transporters".*

Response: The only material Great Lakes Transportation Inc. ("GLT") shipped to the Site was scrap metal for recycling. GLT transshipped metal to be recycled at the Site from generators of those materials to regional warehouses or from regional warehouses to railroad terminals. Please refer to the Introduction, ¶¶ 3, 4 and 5 in particular. On rare occasions, GLT shipped metal directly to the Site for recycling. However, any direct shipments were only made after Chemetco determined the need for a particular type of shipment and specifically requested transportation by GLT. GLT is aware of the following companies who have transported material to the Site or transshipped material that was eventually transported to the Site: Illinois Central Gulf, Canadian National, Norfolk Southern, Conrail, Southern Pacific, Santa Fe, Meir Cartage, Inc., Jack Gray Transportation, U.S. Bulk, PAR Services, Inc., Par Transportation, Inc. and Tri-Me Transportation Inc. The further identification of these entities (e.g., by business address) must await our Supplemental Response).

2. *State whether you accepted materials, including municipal solid waste from a municipality or arranged with a municipality by contract or otherwise, for transport to the Site from any source. If so, below you will be asked to provide detailed information on the nature, quantity, and source of all materials accepted and transported to the Site from each source. In response to this question, provide a general description of the materials transported to the Site and the timeframes in which you transported these materials to the Site.*

Response: Please refer to the Introduction, ¶ 9 in particular. A detailed response to this Request No. 2 must await our Supplemental Response. GLT did not accept solid waste for transport.

3. *List all federal, state and local permits and/or registrations issued to you for the transport and/or disposal of materials.*

Response: GLT operates as a transporter under United States Department of Transportation No. 654324. GLT does not transport solid waste for disposal. GLT does transport scrap metal, a commercial product, for recycling.

4. *Provide the following information about your company:*
 - i. *The complete and correct legal name of the Company.*

Response: Great Lakes Transportation, Inc.

- ii. *The name(s) and addressees) of the President and the Chairman of the Board, or other presiding officer of the Company.*

Response: Joseph Leahy, President, 16400 South Lathrop Avenue, Harvey, Illinois 60626, (708) 331-6258.

- iii. *The state of incorporation of the Company and the company's agents for service.*

Response: Illinois, Craig Westberg.

- iv. *The name(s) of all subsidiaries, affiliates, or parent companies to your Company.*

Response: N/A

- v. *The state of incorporation and agents for service of process in the state of incorporation.*

Response: The state of incorporation is Illinois. GLT's registered agent is: Craig Westberg, 60 Orland Square Drive 300, Orland Park, IL 60462.

5. *State the names, telephone numbers and present or last known addresses of all individuals who you have reason to believe may have knowledge, information or documents regarding any transportation of materials to the Site, the disposal of materials at the Site, or the identities of the companies whose material was disposed of at the Site. For each individual identified, summarize the types of knowledge, information or documents you believe he or she may have.*

Response:

GLT

Joseph Leahy, (708) 331-6258, 16400 South Lathrop, Harvey, Illinois, 60626. Mr. Leahy is president of GLT and has knowledge regarding the transportation of materials to the Site.

Jack Henry, (708) 331-6258, 16400 South Lathrop, Harvey, Illinois, 60626. Mr. Henry dispatched truck drivers pursuant to Chemetco and customer direction. Mr. Henry has knowledge regarding the transportation of materials to the Site.

Angie Loy, address and telephone number unknown. Ms. Loy was an administrator with GLT who managed information about trips such as invoices.

Others

Addresses and telephone numbers for the following persons are unknown.

John Suarez was the owner and president of Chemetco. Mr. Suarez also owned Par Transportation, which transported material to the Site. GLT believes Mr. Suarez may have knowledge of operations at the Site and the type and source of material shipped to the Site.

Dan Suarez managed transportation for Chemetco. He coordinated transportation into and out of the Site. GLT believes Mr. Suarez may have knowledge of transporters that delivered material to the Site.

Art Bogda managed transportation for Chemetco. He coordinated transportation into and out of the Site. GLT believes Mr. Bogda may have knowledge about the type of material that was delivered to the Site and the source of such material.

Frank Lefler managed material receiving and grading at the Site. GLT believes Mr. Lefler may have knowledge about the type of material that was delivered to the Site.

Bruce Hendrickson served as plant manager at the Site. GLT believes Mr. Hendrickson may have knowledge about the type of material that was delivered to the Site, the source of the material, and plant operations.

Jim Moreland served as the assistant plant manager. GLT believes Mr. Moreland may have knowledge about the type of material that was delivered to the Site, the source of the material, and plant operations.

Gary Roberts served as the plant manager. GLT believes Mr. Roberts may have knowledge about the type of material that was delivered to the Site, the source of the material, and plant operations.

Jim Roberts served as an engineer at the plant. GLT believes Mr. Roberts may have knowledge about plant operations.

Dave Hoff served as the plant manager. GLT believes Mr. Hoff may have knowledge about the type of material that came to the Site, the source of the material, and plant operations.

Rick Coleman served as an engineering consultant at the Site. GLT believes Mr. Coleman may have knowledge about the type of material that came to the Site, the source of the material, and plant operations.

Judy Gifford managed the receipt and processing of materials. GLT believes Ms. Gifford may have knowledge about the types of materials and the source of materials that were delivered to the Site.

Bill Faulkner served as Comptroller at Chemetco. GLT believes Mr. Faulkner may have knowledge concerning the sources of materials that were delivered to the Site.

Greg Cotter served as an engineer at the plant. GLT believes Mr. Cotter may have knowledge about plant operations.

William Cassidy was corporate officer of Chemetco. Mr. Cassidy may have knowledge of operations at the Site and the type and source of material shipped to the Site.

John F. Cowling and George M. Von Stamwitz at the law firm of Armstrong Teasdale LLP were legal counsel for Chemetco. Mr. Cowling and Mr. Stamwitz may have knowledge of operations at the Site and the type and source of material shipped to the Site.

Denis L. Feron was the former owner and Chief Executive Officer of Metallo-Chimique. Mr. Feron may have knowledge of operations at the Site and the type and source of material shipped to the Site.

Patrick Feron was employed by Metallo-Chimique. Mr. Feron may have knowledge of operations at the Site and the type and source of material shipped to the Site.

Patrick M. Flynn, the attorney for Suarez. Mr. Flynn may have knowledge of operations at the Site and the type and source of material shipped to the Site.

Juan N. Mena was a business associate of William Wegrzyn. Mr. Mena may have knowledge of operations at the Site and the type and source of material shipped to the Site.

Toben M. ("Toby") Suarez was an employee of Chemetco. Mr. Suarez may have knowledge of operations at the Site and the type and source of material shipped to the Site.

William Wegrzyn was an employee of Chemetco. Mr. Wegrzyn may have knowledge of operations at the Site and the type and source of material shipped to the Site.

Heather Young was an employee of Chemetco. Ms. Young may have knowledge of operations at the Site and the type and source of material shipped to the Site.

Michael Melnyck was an employee of Chemetco. Mr. Melnyck may have knowledge of operations at the Site and the type and source of material shipped to the Site.

Wayne McVey was an employee of Chemetco. Mr. McVey may have knowledge of operations at the Site and the type and source of material shipped to the Site.

Dennis Meyer was an employee of Chemetco. Mr. Meyer may have knowledge of operations at the Site and the type and source of material shipped to the Site.

Rob Feldman was an employee of Chemetco. Mr. Feldman may have knowledge of operations at the Site and the type and source of material shipped to the Site.

Tony Carey was an employee of Chemetco. Mr. Carey may have knowledge of operations at the Site and the type and source of material shipped to the Site.

Michelle Reznek was an employee of Chemetco. Ms. Reznek may have knowledge of operations at the Site and the type and source of material shipped to the Site.

6. *State whether there exists any agreement or contract (other than an insurance policy) which may identify your Company, for any liability that may result under CERCLA for any release of a hazardous substance from the Site. If so, please provide a copy of the agreement or contract. Identify any agreement or contract that you are unable to locate or obtain and describe the relevant information contained therein. Identify by name and job title the person who prepared the document, and if the document is not readily available, state where it is stored or maintained and why it is no longer available.*

Response: A response to the Request must await our Supplemental Response.

7. *State whether an insurance policy has ever been in effect which may identify [sic][indemnify] your Company against any liability which the Company may have under CERCLA for any release or threatened release of a hazardous substance that may have occurred at the Site. If so, please provide a copy of the policy. Identify any policy that you cannot locate or obtain by the name of the carrier, years in effect, nature and extent of coverage, and any other information you have.*

Response: A response to the Request must await our Supplemental Response.

8. *Identify all persons and entities from whom you accepted materials which were taken directly or indirectly to the Site.*

Response: A response to the Request must await our Supplemental Response.

9. *Identify the owners of the materials that were accepted for transportation by you, if not the same as the persons or entities described in 8, above.*

Response: A response to the Request must await our Supplemental Response

10. *Identify the person who selected the Site as the location to which you took the materials.*

Response: Please refer to the Introduction, ¶¶ 4 and 5 in particular. On the rare occasions GLT shipped material directly to the Site.

11. *Describe the measures taken by each person or company who gave the materials to you to transport to the Site to control how you would handle the materials in their transport to the Site.*

Response: GLT primarily transshipped metal to be recycled at the Site from generators of those materials to regional warehouses or from the warehouses to railroad terminals. GLT rarely shipped material directly to the Site. On the rare occasions GLT shipped material directly to the Site, persons or companies who provided materials for transport did not take measures to control how GLT would handle the material during transport.

12. *For each material taken to the Site, describe any warnings or instructions given to you with respect to its handling.*

Response: GLT primarily transshipped metal to be recycled at the Site from generators of those materials to regional warehouses or from regional warehouses to railroad terminals. GLT rarely shipped material directly to the Site. On the rare occasions GLT shipped material directly to the Site, GLT did not receive any warnings or instructions with respect to handling material that was taken to the Site.

13. *Identify all the Sites at which the materials were transshipped, or were stored or held at, prior to their final shipment to the Site.*

Response: Triangle Metallurgical Services, Inc. and later Warehouse Management Services, Inc. owned or leased warehouses in the following cities where materials were transshipped or were stored or held prior to their final shipment to the Site: Los Angeles, California; Chicago, Illinois; Phoenix, Arizona; Houston, Texas; Dallas, Texas; St. Louis, Missouri; Indianapolis, Indiana; Minneapolis, Minnesota; Newark, New Jersey; Pittsburgh, Pennsylvania; Boston, Massachusetts; Cleveland, Ohio; Montreal, Quebec; Detroit, Michigan; Grand Rapids, Michigan; Milwaukee, Wisconsin; Quad Cities, Iowa/Illinois; Anniston, Alabama; Atlanta, Georgia; Charlotte, North Carolina; Tulsa, Oklahoma; Miami, Florida; Baltimore, Maryland; San Antonio, Texas; Little Rock Arkansas; El Paso, Texas; Toronto, Ontario, and Seattle, Washington. GLT Transportation operated as many as one truck in Los Angeles, California; two trucks in Cleveland, Ohio; and four trucks in the Chicago, Illinois area. The locations of the Chicago warehouses are identified in the Introduction, ¶¶ 1, 3 and 6. Sometime around 1996 Meir Cartage, Inc. expanded beyond drayage to transportation from customers to the warehouse (see ¶ 7 of the Introduction). After that time, the number of trucks operated by GLT was as few as two and as many as eight.

14. *Provide the amount paid to you as a Transporter for accepting the materials for transportation to the Site, the method of payment, and the identity of the person who paid you.*

Response: A response to the Request must await our Supplemental Response.

- i. the years during which each customer's materials were taken to the Site.*

Response: Between 1992 and 2001, customers' materials were transshipped for later transport to the Site by another company or, on rare occasions, transported directly to the Site.

- ii. Provide copies of all tests, analyses, and analytical results concerning each material that you took to the Site.*

Response: GLT does not have and is not aware of such documents.

- iii. If you do not have documents responsive to the previous question, but believe others do, identify who might have such documents and the basis for such a belief.*

Response: GLT believes Chemetco analyzed material coming on to the Site for purposes of determining the value of materials. Chemetco might have such documents.

- iv. Describe the containers used to ship materials from each customer sending materials to the Site, including containers (if any) that you provided to customers for such use, including but not limited to:*

- 1. the type of container (e.g. 55 gal. metal drum, 15 gal. cardboard drum, 5 gal. metal pail, etc.);*

Response: Materials were shipped in 55 gallon metal drums and Gaylord boxes.

- 2. the condition of the container (e.g. open, closed, sealed, damaged, new, used, etc.);*

Response: GLT does not recall the condition of the containers but may be able to provide additional information in its Supplemental Response.

- 3. the color of the container;*

Response: GLT does not recall the color of the containers but may be able to provide additional information in its Supplemental Response.

4. *any distinctive stripes or other marking on the containers;
and*

Response: GLT does not recall any distinctive stripes or other markings on the containers but may be able to provide additional information in its Supplemental Response.

5. *any labels or writing on those containers (including the content of those labels or writing).*

Response: GLT does not recall any labels or writing on the containers but may be able to provide additional information in its Supplemental Response.

- v. *Provide copies of all documents (including but not limited to log books, dump slips, manifests, receipts, and invoices) created or kept by you related to the collection of materials (including, but not limited to, composition and quantity of materials) from customers whose materials were taken to the Site.*

Response: A response to the Request must await our Supplemental Response.

- vi. *Provide copies of all documents created or kept by you related to the nature, quantity or source of materials taken to the Site.*

Response: A response to the Request must await our Supplemental Response.

- vii. *Provide copies of the correspondence to and from Chemetco and to and from any company sending material to Chemetco.*

Response: A response to the Request must await our Supplemental Response.

- viii. *Provide all records created or kept by you concerning the nature or quantity of materials:*

1. *collected from customers; and*

Response: A response to the Request must await our Supplemental Response.

2. *taken to the Site.*

Response: A response to the Request must await our Supplemental Response.

- ix. *Identify all of your employees who may have taken or accompanied materials to the Site.*

Response: A response to the Request must await our Supplemental Response.

- x. *Identify your office manager during the time materials were transported to the Site.*

Response: During the period of time GLT provided shipping services to Chemetco, Angie Loy was the office manager.

- xi. *Identify your bookkeeper or other employee who handled the company's checkbook and accounts receivables during the time materials were transported to the Site.*

Response: During the period of time GLT provided shipping services to Chemetco, Angie Loy was the bookkeeper.

- xii. *Describe the vehicles used to transport materials to the Site, including but not limited to:*

1. *type of vehicles (e.g. tanker, flatbed, etc.);*

Response: During the period of time GLT provided shipping services to Chemetco, GLT used semi tractors to transport trailers of material.

2. *the color(s);*

Response: GLT does not recall the colors of vehicles used during the period of time GLT provided shipping services to Chemetco.

3. *distinctive markings (e.g. company names, logo); and*

Response: During the period of time GLT provided shipping services to Chemetco, GLT vehicles had the company name and United States Department of Transportation number visible on their sides. Trailers each had their own numbers, but they were owned by the railroad.

4. *number(s) of each type of vehicle.*

Response: Sometime around 1996 Meir Cartage, Inc. expanded beyond drayage to transportation from customers to the warehouse (see ¶ 7 of the Introduction). After that time, the number of trucks operated by GLT was as few as two and as many as eight.

- xiii. *Identify other Transporters that used to transport materials to the Site, including the types of vehicles used.*

Response: Illinois Central Gulf, Canadian National, Norfolk Southern, Conrail, Southern Pacific, and Santa Fe transshipped material by railcar, which was later

transported to the Site. Jack Gray Transportation and U.S. Bulk transported materials to the Site using dump trailers. Par Transportation, Inc. transported materials to the Site in trailers.

15. *Describe what was done to each type of material after it was taken to the Site.*

Response: GLT is not aware of what was done to material after it was taken to the Site. Please refer to the Introduction, ¶ 8 in particular.

i. Describe where each type of material brought to the Site was disposed of or otherwise placed.

Response: GLT is not aware of what was done to each type of material after it was taken to the Site. Please refer to the Introduction, ¶ 8 in particular.

ii. If particular types of materials were placed or disposed of in separate or specific areas of the Site, indicate:

- 1. the types of materials so placed or disposed;*
- 2. where on the Site those materials were placed or disposed; and*
- 3. how those materials were placed or disposed.*

Response: GLT is not aware of what was done to each type of material after it was taken to the Site. Please refer to the Introduction, ¶ 8 in particular.

iii. If particular customers' materials were placed or disposed of in separate or specific areas of the Site, indicate:

- 1. the identity of each such customer,*
- 2. the nature and chemical composition of the customer's material so placed or disposed;*
- 3. the quantity of each such customer's material so placed or disposed; and*
- 4. where on the Site each such customer's material was so placed or disposed.*

Response: GLT is not aware of what was done to each type of material after it was taken to the Site. Please refer to the Introduction, ¶ 8 in particular.

iv. If drums were placed or disposed of at the Site, indicate:

- 1. where they were placed or disposed; and*
- 2. their condition when placed or disposed*

Response: GLT is not aware of placement or disposal activities at the Site. Please refer to the Introduction, ¶ 8 in particular.

- v. *If liquids were placed or disposed of at the Site, indicate whether and how liquids were:*
1. *mixed at the Site;*
 2. *placed or disposed in a separate areas; and*
 3. *placed or disposed in their containers or removed from their containers.*

Response: GLT is not aware of placement or disposal activities at the Site. Furthermore, GLT did not transport or transship liquids to the Site. Please refer to the Introduction.

- vi. *Describe all procedures undertaken by you and the Site operator upon your arrival/entry on to the Site, including but not limited to:*
1. *the completion of any documentation of disposal/placement at the Site;*
 2. *any exchange of cash or checks; and*
 3. *any review of permits or other authorities to dispose/place materials at the Site.*

Response: GLT primarily transshipped metal to be recycled at the Site from generators of those materials to regional warehouses or from regional warehouses to railroad terminals. GLT rarely shipped material directly to the Site. GLT is not aware of procedures undertaken at the Site after arrival.

- vii. *Describe your procedures for paying for the disposal/placement of materials at the Site, including but not limited to:*
1. *method of payment (e.g. cash, check, money order);*
 2. *the frequency of which those payments were made;*
 3. *to whom those payments were made;*
 4. *the total amount of those payments and the rates paid;*
 5. *where those payments were made (e.g. at the Site, sent in mail, etc.); and*
 6. *provide the identity of the employee/agent in charge of accounting for and making such payments.*

Response: GLT did not pay for the disposal or placement of material at the Site.

- viii. *Identify other individuals and entities that you have reason to believe may have taken or sent materials to the Site.*

Response: Other than those individuals and entities listed in response to previous questions, GLT is not aware of any other individuals or entities that it has reason to believe may have taken or sent materials to the Site.

- ix. *Of those individuals and entities identified in the response to the preceding question, specify which individuals or entities you*

observed at the Site, and indicate when those observations were made.

Response: GLT primarily transshipped metal to be recycled at the Site from generators of those materials to regional warehouses or from regional warehouses to railroad terminals. GLT rarely shipped material directly to the Site. GLT does not recall observing individuals or entities at the Site.

16. *Please state the name, title and address of each individual who assisted or was consulted in the preparation of the response to this information request.*

Response:

Joseph Leahy, President of GLT, 16400 South Lathrop Avenue, Harvey, Illinois 60626, (708) 331-6711.

Jack Henry, former employee of GLT, 16400 South Lathrop, Harvey, Illinois, 60626, (708) 331-6711.

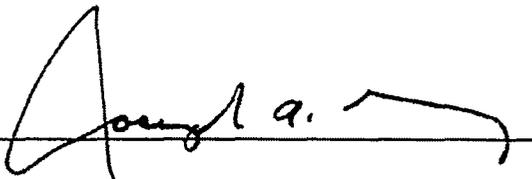
Edward Dwyer, attorney, Hodge Dwyer & Driver, 3150 Roland Avenue, Post Office Box 5776, Springfield, Illinois 62705-5776, (217) 523-4900.

Matthew Read, attorney, Hodge Dwyer & Driver, 3150 Roland Avenue, Post Office Box 5776, Springfield, Illinois 62705-5776, (217) 523-4900.

Jeffery D. Jeep, attorney, Jeep & Blazer, LLC, 24 N. Hillside Avenue, Suite A, Hillside, Illinois 60162, (708) 236-0830.

CERTIFICATION

I, Joseph A. Leahy, certify that I have read the above and foregoing Great Lakes Transportation, Inc. Response to USEPA Request for information dated March 21, 2011, and documents attached thereto, and know the contents thereof; and that the same are true and accurate to the best of my knowledge, Information and belief.



Joseph A. Leahy, President
Great Lakes Transportation, Inc.

July 1, 2011
Date



July 1, 2011